

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

v.

Case:2:23-cr-20192
Judge: Roberts, Victoria A.
MJ: Patti, Anthony P.
Filed: 03-29-2023 At 02:58 PM
INDI USA V SCOTT SAMONEK (LG)

SCOTT SAMONEK,

Defendant.

Violations:

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 922(g)(1)

Indictment

The Grand Jury charges that:

Count One

**Possession with Intent to Distribute Cocaine
21 U.S.C. § 841(a)(1)**

On or about March 21, 2023, in the Eastern District of Michigan, the defendant, Scott Samonek, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the controlled substance involved was 500 grams or more of a mixture and substance containing a detectable

amount of cocaine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

The defendant, Scott Samonek, having a prior conviction for a serious drug felony for which he served a term of imprisonment of more than twelve months, and having been released from any term of imprisonment within fifteen years of the commencement of the instant offense, is subject to increased penalties provided under Title 21, United States Code, Sections 841 and 851.

Count Two
Possession of a Firearm in Furtherance of a Drug-Trafficking
Crime
18 U.S.C. § 924(c)(1)(A)

On or about March 21, 2023, in the Eastern District of Michigan, the defendant, Scott Samonek, knowingly possessed a firearm in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, as charged in Count One of this

Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

Count Three
Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

On or about March 21, 2023, in the Eastern District of Michigan, the defendant, Scott Samonek, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting foreign and interstate commerce, a firearm, that is, a Glock model 23 .40 caliber pistol, Smith & Wesson model SW40VE .40 caliber pistol, Panther Arms DPMS model a-15 5.56/.223 caliber rifle, Smith & Wesson model M&P40 .40 caliber pistol, Glock model 26 9mm pistol, and SCCY model CPX2 9mm pistol, in violation of Title 18, United States Code, Section 922(g)(1).

Forfeiture Allegations

The allegations contained in Counts 1, 2, and 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 924(d)

together with Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

Under Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461(c), upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g) or 924(c) set forth in Counts 2 and 3 of this Indictment, the defendant shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of the offenses, including, but not limited to: a Glock model 23 .40 caliber pistol, Smith & Wesson model SW40VE .40 caliber pistol, Panther Arms DPMS model a-15 5.56/.223 caliber rifle, Smith & Wesson model M&P40 .40 caliber pistol, Glock model 26 9mm pistol, and SCCY model CPX2 9mm pistol.

Under Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or

intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

As part of the forfeiture in this case, the United States intends to seek entry of a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

This is a True Bill.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

/s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

/s/ Paul Kuebler
Paul Kuebler
Assistant United States Attorney

Dated: March 29, 2023

ORIGINALUnited States District Court
Eastern District of Michigan

Criminal Case Cover

Case:2:23-cr-20192

Judge: Roberts, Victoria A.

MJ: Patti, Anthony P.

Filed: 03-29-2023 At 02:58 PM

INDI USA V SCOTT SAMONEK (LG)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: pk <i>PK</i>

Case Title: USA v. Scott SamonekCounty where offense occurred: Wayne ✓Offense Type: Felony ✓

Indictment – no prior complaint.

Superseding Case Information

Superseding to Case No: _____

Judge: _____

Reason: _____

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

March 29, 2023 ✓

Date

Paul A. Kuebler ✓
Paul Kuebler

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, MI 48226

Paul.Kuebler@usdoj.gov

(313) 226-9641

Bar #: NY4268561

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.